



The Secretary
Senate
Information Technology and the Arts References Committee
Parliament House
CANBERRA ACT 2600
Fax 6277 5818
ecita.sen@aph.gov.au

Environment,
Communications,

Dear Sir

Submission to Senate Inquiry into the Reserve System

Thank you for the opportunity to make a submission to the inquiry.

Time constraints have prevented us from presenting as detailed a submission as we had hoped.

Introduction

The Clarence Valley Branch (CVB) is one of 19 branches of the National Parks Association of NSW (NPA), established in 1980 to support the reservation and sound management of national parks and reserves within the Clarence Valley in northern NSW. That broad purpose includes protection of native animals, plants, and natural landscapes. CVB has an interest in applying broad principles of nature conservation outside the local geographical area.

In this submission “national park” is often used to cover conservation reserves in general. The context should make it clear.

The sound management of the reserve system is made complex and complicated by the different demands on their use and by lack of understanding and/or support for their purpose.

As a result, a lot of resources are directed into construction, repair and maintenance (which can increase the environmental impact on the natural setting beyond what are acceptable within the objective), and control, s. So, this means that the national park management structure is weighted more towards people management than nature management than is desirable.

National park funding needs increasing, but directed to better achieving management that complements conservation objectives.

A. THE VALUES AND OBJECTIVES OF AUSTRALIA'S NATIONAL PARKS, OTHER CONSERVATION RESERVES AND MARINE PROTECTED AREAS.

Sec2A, objects of the *NSW National Parks and Wildlife Act* and Sec 30E, national park management principles, are provided below.

2A Objects of Act

- (1) The objects of this Act are as follows:
 - (a) the conservation of nature, including, but not limited to, the conservation of:
 - (i) habitat, ecosystems and ecosystem processes, and
 - (ii) biological diversity at the community, species and genetic levels, and
 - (iii) landforms of significance, including geological features and processes, and
 - (iv) landscapes and natural features of significance including wilderness and wild rivers,
 - (b) the conservation of objects, places or features (including biological diversity) of cultural value within the landscape, including, but not limited to:
 - (i) places, objects and features of significance to Aboriginal people, and
 - (ii) places of social value to the people of New South Wales, and
 - (iii) places of historic, architectural or scientific significance,
 - (c) fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation,
 - (d) providing for the management of land reserved under this Act in accordance with the management principles applicable for each type of reservation.
- (2) The objects of this Act are to be achieved by applying the principles of ecologically sustainable development.

Division 2 Management principles

30E National parks

- (1) The purpose of reserving land as a national park is to identify, protect and conserve areas containing outstanding or representative ecosystems, natural or cultural features or landscapes or phenomena that provide opportunities for public appreciation and inspiration and sustainable visitor use and enjoyment so as to enable those areas to be managed in accordance with subsection (2).
- (2) A national park is to be managed in accordance with the following principles:
 - (a) the conservation of biodiversity, the maintenance of ecosystem function, the protection of geological and geomorphological features and natural phenomena and the maintenance of natural landscapes,
 - (b) the conservation of places, objects, features and landscapes of cultural value,
 - (c) the protection of the ecological integrity of one or more ecosystems for present and future generations,
 - (d) the promotion of public appreciation and understanding of the national park's natural and cultural values,
 - (e) provision for sustainable visitor use and enjoyment that is compatible with the conservation of the national park's natural and cultural values,
 - (f) provision for the sustainable use (including adaptive reuse) of any buildings or structures or modified natural areas having regard to the conservation of the national park's natural and cultural values,
 - (g) provision for appropriate research and monitoring.
- (3) In carrying out functions under this Act, the Minister, the Director-General and the Service are to give effect to the following:
 - (a) the objects of this Act,
 - (b) the public interest in the protection of the values for which land is reserved under this Act and the appropriate management of those lands.

Sec 2A(1)(c) contains the objective which considers recreation and use by fostering public appreciation, understanding and enjoyment.

Sec 30E, applying to national parks, complements and expands upon the objectives of the Act. It is clear – (2)(e) - that visitor use has to be sustainable, and recreation has to be compatible with conservation objectives. CVB considers that the intentions of reservation, management and use that appear in the Act are generally sound. However, the interpretation and application too often stretches the meaning of the words to an unacceptable point.

B. ARE GOVERNMENTS ARE PROVIDING SUFFICIENT RESOURCES TO MEET THOSE OBJECTIVES AND THEIR MANAGEMENT REQUIREMENTS.

While there has been an increase in funding for national parks over the years, there is a need for increased funding for a range of practical management reasons which will lead to better achievement of objectives.

- 1) Acquisition. There remain many areas which, if acquired, would assist in achieving a complete and adequate reserve system. In some cases, these adjoin or are in close proximity to existing reserves. In such cases, practical management objectives such as rational boundaries would be greatly assisted as well as enhancing long-term viability of ecosystems.

Rationalising boundaries assists in reducing demand on resources through

- ▶ Reduced fencing costs because they are generally shorter;
- ▶ Improved capacity to manage fire;
- ▶ Continuity of habitat and decrease in fragmentation and/or indentation problems;
- ▶ Simpler and more easily identifiable boundaries;
- ▶ More appropriate visitor facilities. Areas on periphery of reserves often comprise highly modified land allowing facilities to be provided at minimal compromise of conservation values;
- ▶ Taking opportunities to purchase when an owner wants to sell. These can be lost permanently if there are a willing seller and buyer, but the buyer does not have the funds within a convenient timeframe.

Other areas need to be acquired to conserve ecosystems that are under-represented or are necessary for the survival of migratory species. One example of the latter is the orange-bellied parrot which spends time in Victoria as well as Tasmania.

Much has been achieved in the past in setting up the reserve system but more needs to be done.

Increasing knowledge and understanding of the environment mean that some fine-tuning of existing reserves, by addition or extension, is necessary

- 2) Expertise. As the pendulum has swung away from the conservation side, and more to the provision of visitor facilities, so the resource of well qualified personnel who operate in ecosystem management has become comparatively less. This is reflected in the number of consultants that are used to fill the gap. While many of these do a very good job, it would be of value for the agency to have more employed as staff to both absorb and contribute to the national park culture and ethic.

Availability of permanent staff, especially for projects that might be broken

(perhaps, for example, for seasonal reasons) and/or require long-term commitment of specialist resources would assist in achieving a number of objectives.

It could be argued that by providing for a larger employment opportunity, more people will be attracted to the relevant training courses, thus better ensuring that the pool of expertise is always there.

- 3) Community awareness and understanding. Many of the threats to sound management of the reserve system result from ill-informed ideas of the value and the objectives of national parks. There should be sufficient funding to allow agencies to provide good resources for community education, interpretation and support for some guided activities, such as flora and fauna observation.

While a great deal of good work is already done, it could be more effective with better resourcing of materials, trained personnel and programmes.

The NSW NPWS discovery ranger programme is a good model, which could be expanded in a number of ways. Permanent staffing with an enlarged rôle that would include schools, media and more frequent and varied group activities in the field would progress the fostering of public appreciation objective.

The predecessor, the seasonal ranger programme, used to be free, but the current programme involves many more activities which require payment. Improved funding, providing more free activities as well as a wider and more frequent programme would assist in meeting the objective of greater public appreciation, understanding and enjoyment of nature and other relevant values.

Success in this area would lead to fewer problems that result from inappropriate demands and activities, with a consequent freeing up of resources to be devoted to national park objectives.

C. ANY THREATS TO THE OBJECTIVES AND MANAGEMENT OF OUR NATIONAL PARKS, OTHER CONSERVATION RESERVES AND MARINE PROTECTED AREAS;

Motor Bikes Inappropriate use such as and dirt-bike or trail bike riding can lead to physical impact leading to vegetation destruction and erosion, as well as impact on species through fragmentation of habitat and changing water movement.

Noise becomes a factor with motor bikes, and can affect the enjoyment of others hundreds of metres away. Bikes present a real danger to other users of roads or tracks when they can emerge suddenly at speed, over a crest or round a bend.

4WD vehicles CVB is not opposed to 4WDs in national parks *per se*. Used like an ordinary vehicle, and they remain on approved roads, their height gives some advantages for observation.

4WDs become a problem when they depart from the public access road system, or are driven in conditions that damage road surfaces. While noise is generally less of a problem than for motor bikes, the threats outlined above also apply to 4WDs.

There are many examples, particularly in coastal and heath areas where there are few physical barriers to determined drivers, where significant erosion and change to water flow is obvious. The NPWS has made numerous attempts by signposting and gating to prevent

unauthorised access. These are ignored by many, and gates damaged or new tracks made to get past them. Some areas seem to be used as testing grounds to drive the vehicles to the limit of their abilities.

Multiple tracking is a common occurrence, with some tracks running short distances from a formed road, for no apparent reason.

As a general rule, all vehicular access in national parks should be on roads that a normal sedan can use.

CVB opposes the use of beaches for 4WDs. Apart from environmental damage, both on the beaches and the access approaches, this use can constitute a considerable diversion of funds away from work that advances the objectives of the reserves.

Management trails are often used by 4WDs, sometimes with the approval of the agency. One of the arguments advanced is that use by 4WDs can assist in management by keeping little-used tracks open.

CVB believes that the damage done by the “irresponsible minority”, and even by the well-intentioned drivers, outweighs benefits in many cases.

Funding should be sufficient to ensure the management agency is able to maintain roads and tracks without dependency on ad hoc or informal arrangements with sections of the general public.

Horse-riding CVB opposes horse riding in areas reserved for conservation purposes. CVB refers the Senate Committee to the horse riding policy of the NPA for detail.

Fishing and Motor Boating These activities generate demands on management for facilities and access that conflict with national park objectives.

This comes about by the provision of boat ramps, boat parking areas (often at the expense of users whose interests and recreation are related to the appreciation and enjoyment of nature) and even fish cleaning areas. Generally, these activities are unrelated to any national park purpose – fishing and boating would occur whether a national park were there or not – and create conflict with other users.

Provision of access for boats also opens up beaches to inappropriate vehicle use.

A distortion in the use of funds and resources is created, as well as adverse environmental impact.

Jet skis These vehicles have adverse impacts on both marine and land reserves. The enjoyment of hundreds of people can be affected by one individual on a jet ski. The enjoyment they provide to the users cannot be said to be compatible with any of the objectives for natural areas. It is understood that they have been banned from Sydney Harbour. Such a ban should be implemented in natural areas.

Commercial Operations

- ▶ Bee-keeping sites on national parks are a threat to nature conservation values, ecosystem integrity, safety of passive recreationists, and the best management of tracks through the reserve.
Current NSW policy allows apiary sites on parks under a licence system, and gives the industry organisation the right to determine ownership. There is no basis in the management objectives which allow this to happen.
- ▶ The NPWS itself is under pressure to raise revenue. This is done in a number of ways, including visitor fees. Visitor fees appear to have led to demand for higher standard and inappropriate facilities. Camping areas have been extended and hardened, more permanent structures built and so on. This can have the effect of destroying the national park setting and have it look like an urban one, with consequences for the objective of enjoyment of nature.

The NPWS has lease arrangements which generate funds as well as providing non-national park services to visitors. This stands out particularly in places close to villages or shops which provide competing services. There should be sufficient funding to remove the need for the NPWS to become a commercial operator in its own right.

- ▶ In Kosciusko National Park, CVB hopes that the Committee will consider the operation and funding arrangements between the NPWS and resort operators to ensure that costs and provision of services are fair and equitable.

Tourism Well managed, tourism can complement and further the objectives of national parks. It also has the potential to destroy the very purpose and attraction that natural areas have for visitors.

In 2005, the NPWS released a discussion paper called Living Parks: Draft Visitation Strategy, and the submission made by CVB is attached for the use of the Senate Committee.

Introduction

There has been a failure on the part of the national park managers, the NPWS, and environment groups to the extent that they are supporters of the NPWS and good management of the reserve system, to develop a community understanding of the conservation purpose of national parks and the appropriate recreation and nature of facilities and developments within them. The Auditor General has recognized the difficulties that exist.

To a large extent, the failure has been a result of the politics associated with reserving national parks, and the focus on setting up a CAR system. It is also a fact that national park management requires greater thought and planning than most other agencies have to consider. Added to this is the intangible nature of the values, especially economic, that national parks provide.

An example is the introduction of fees. The NPWS has been reacting to pressure to provide “value-for-money” by constructing facilities which are, often, inappropriate. This has led to hardening and straightening and crowding, and the consequent loss of the sense of remoteness, quiet and being in a natural setting. Day visitors are crowded out by vans and tents, large toilet blocks and dedicated parking bays. Appropriate activities such as birdwatching and nature observation generally can be denied access by the accommodation of longer term visitors whose main interest might be launching a boat and going fishing, whilst their boat trailer sits on the visitor area.

Had the public had different expectations of the facilities and recreational opportunities of national parks, the introduction of fees might not have led to expectations of “providing value for money” that appears to have driven some developments. And the NPWS might have been able to concentrate more on better achieving the key objects and reducing the tension between them that the auditor-General sees.

Clarence Valley Branch does not agree that there is a natural tension between the two key objects – rather it is the failure to develop an understanding and appreciation through leadership, example and education. This failure has not been helped by the constant interference of politics, and the influence of inappropriate recreational interests.

Properly fitting national parks into the recreational opportunity spectrum, using the visitation strategy, will begin to remove what is the *unnatural* tension between the two key objects.

Recent changes in the direction of facilities and works in Washpool National Park demonstrate how NPWS can address the convergence, rather than the divergence of the two key objects.

There is a natural tension between the key objects of the *National Parks and Wildlife Act 1974*, being to:

- *conserve, protect and manage the State's natural and cultural heritage and*
- *provide opportunities for the public to enjoy, appreciate and support this heritage within reserves.*

The Service is required to manage these tensions.

Performance Audit: managing natural and cultural heritage in parks and reserves: National Parks and Wildlife Service / [The Audit Office of New South Wales]. June 2004. Forward

Opportunities

LP (Living Parks Draft Visitation Strategy) gives a chance to move on from the turbulence of the past to a more mature stage which reduces the inherent conflict between conservation and human use. It is important that good conservation management not be swamped by economic, social and tourism pressures that only pay lip-service to good park management. Towards 2020 – New South Wales Tourism Masterplan (Tourism New South Wales, 2002), seems to be a controlling document under which *LP* has been produced.

While the *LP* reads very well, some actions on the ground seem to have little relationship to the world it describes. This is not to say that much good has not been achieved, but the thrust of this submission is to identify conflict between words and actions and to aim for a convergence and compatibility between the two.

The opportunity *LP* strategy gives to rectify the lack of progress in developing strong support for the national parks ideal, and the ability of the NPWS to withstand inappropriate demand needs to be grasped now.

The statement in the DEC Corporate Plan for 2004-06 on the role of the Parks & Wildlife Division. The term “sustainable tourism” needs to be developed in relation to national parks, so that it complements and enhances the nature conservation objectives and purpose for which national parks are reserved.

There is a danger that Sustainable tourism will become like “eco-tourism” and mean little more than anything that happens in natural locations.

The Sustainability Programs Division, DEC, which “seeks to accelerate the shift towards environmentally sustainable practices through community education and information”, has a role in developing community understanding and appreciation of national parks and appropriate use.

Parks and Wildlife Division

Conserves protected and threatened native plants and animals, and objects and places of Aboriginal and historic heritage significance within reserves and wilderness areas through:

- acquisition and management of parks and reserves, including fieldbased conservation of wildlife and cultural heritage and control of pests, weeds and fires
- partnerships with Aboriginal communities and private landholders
- visitor facilities and promoting sustainable tourism.

Carrying Capacity

CVB has found a reluctance in the NPWS to determine the carrying capacity for visitor areas. (Outcome 1.2 refers to “appropriate visitor numbers”)

It should be considered a necessary part of planning and management. Having it in place, and understood and accepted by visitors, has a number of advantages

- (1) establishing a measure of acceptable impact on the natural processes;
- (2) reducing or managing pressure for expansion and/or overcrowding;
- (3) better monitoring

LP gives an opportunity to rectify this omission from planning and education and thus to improve long-term sustainability. It will contribute to a better result all round.

**Attachment: Submission to Living Parks Draft Visitation Strategy March, 2006
Comments on the Draft Strategy**

1. While the Living Parks document is a draft *visitation* strategy, it is clear from its connection with the documents listed in the reference, that it is very much concerned with tourism on the larger scale. It is also clear from these other references that there are expectations that national parks will be a key component of tourism strategies. From references within *LP*, it is probably even a subservient document to *Towards 2020*.

1. **Department of Tourism, Sport and Recreation (2004).** *Our Natural Treasures – Nature in Tourism Plan for New South Wales.*
2. **Tourism New South Wales (2002).** *Towards 2020 – New South Wales Tourism Masterplan. Tourism New South Wales, Sydney.*
3. **Tourism and Transport Forum Australia (2004).** *A Natural Partnership: Making National Parks a Tourism Priority.*

The Clarence Valley Branch sees this as potentially dangerous for the vision of national parks as places primarily for conservation, with visitors and visitor facilities complementing and enhancing that. Already, we see too much hardening of facilities, on too large a scale and in a way that does not achieve the desired aim of introducing the community to national parks.

If, when visitors come into a national park, the setting is no different from that in their town park, then the potential of the experience is not only diminished, the sentiments expressed by the Minister are not met.

The best visitor facilities are often those that are unobtrusive. They do their job by allowing visitors to experience the environment without distraction and without damage. Visitors come to parks to experience the environment. The facilities we develop are not an end in themselves; they are a means to help each visitor get the most from their experience.
Minister's Foreword *LP*

2. National parks and the NPWS should not be seen as "just" another aspect of tourism opportunities.

The history of their reservation which, in many cases, followed vigorous community debate about the natural values, and the question of use and this history should be respected and reflected in their management and the way visitation occurs. The examination of visitation to national parks is an opportunity for consideration of some of the directions this is going, particularly in relation to facilities provided, and carrying capacity.

The special status and the objects for which national parks are reserved are governed by

- the NP&W Act 1974
- internationally accepted definitions and criteria – eg the IUCN
- community expectations and values, and often, the history of the reservation (cultural heritage).

The objects of the NP&W Act are the conservation of nature, and places and features in the cultural landscape together with fostering public appreciation, understanding and enjoyment of nature and cultural heritage and their conservation.

The purpose and management principles for national parks are set out in Section 30E, subsections (1) and (2) and recreation use is clearly secondary to the primary purpose of conservation of nature.

Subsection (2) states that a national park is to be managed in accordance with the following principles, one of which is

- (c) provision for sustainable visitor use and enjoyment **that is compatible with** the conservation of the national park's natural and cultural values

Section 72AA, Objectives and content of plans of management, further emphasises the protection of nature.

NPWS, in all relevant communications with other organisations, as well as in LP, should be conveying this message in the strongest terms. Managers of tourism (Tourism NSW; licensed operators...) have to be supporters and advocates for appropriate use of national parks to enhance the sustainability of their part in the overall tourism strategy

- 3.** Either Guiding Principle 2 or 4 should be expanded to ensure that use, services and facilities are low-key and compatible with natural settings; or a separate Guiding Principle should be added.

The purpose of this is to ensure that not only is the environmental impact minimised, but buildings and facilities blend in and do not dominate the setting.

CVB finds the discussion for Outcome 1.4, on page 16 of LP covers the philosophy very well. NPWS can, however, do much better in translating that discussion to match what happens on the ground.

This will help in developing community attitudes, support for, and expectation of national parks.

Guiding Principle 2.
Visitor use and associated facilities and services are managed to ensure that they are environmentally sustainable and culturally appropriate.

Guiding Principle 4.
Visitor use is managed so that it plays a positive role in promoting and facilitating management of parks.

- 4.** A fundamental principle of tourism/visitation in national parks should be that the **commercial operation and licensing processes will not conflict with or impinge on the rights and activities of the self-sufficient and/or independent visitor to national parks.**

This should be included as a Guiding Principle in LP, perhaps before 5. It should also be incorporated into the holistic approach by the Government and adopted by other agencies.

Guiding Principle 5.
Commercial operators within parks will be subject to a consistent and clear set of rules that facilitate activities consistent with the protection of conservation values, while providing a sound financial return for government.

5. CVB agrees with Guiding Principles 6, 7 and 8. It is important that the development of facilities fits in with the natural setting if 6 is to be realised. If visitors see hardened surfaces and domineering structures, and that is their main contact with national parks, then then they will not develop the “informed choices about recreation opportunities” referred to.

Guiding Principle 7 is seen as very important. It picks up the concept of the Recreational Opportunity Spectrum (Stankey and ??) which CVB became aware of in the early 1980’s.

An integrated tourism strategy would improve the sustainable visitation to national parks by shifting inappropriate activities and developments to more suitable settings. This would have benefits for biodiversity and visitors in the long-term as they would have better “national park” experiences. The net social and economic benefits would also be enhanced.

Guiding Principle 8 is understood by CVB to mean “opportunities” which reflect activities which are appropriate within the national park setting.

Changing “across” to “to be found in” would better reflect this understanding.

If the purpose of 8 is to convey diversity which comes about by the different types of national parks, eg coastal, rainforest, arid, then clarification of the wording should be considered.

6. Information and interpretation are integral to visitor understanding and appreciation of the natural and cultural values of parks as part of the landscape and in making informed choices about recreation opportunities.

7. Planning for visitation is done on a regional basis, taking into account visitor opportunities across all land tenures.

8. Diversity of opportunities for visitors to experience the natural and cultural heritage values across NSW’s parks.

6. Guiding Principle 10. CVB agrees the contribution that national parks make to the regional economies and local communities is significant. At the same time, CVB believes that this contribution is undervalued, and while this remains the case, pressures will be brought to bear to have “national parks pay their way”.

This can manifest itself in a number of ways:

- Treasury requires NPWS to raise funds – leading to park fees, Discovery Programme fees, provision of hard accommodation, upgraded facilities – and a move away from the desired experience.
- Visitors coming with expectations that their value for money requires “better” toilets and facilities. The Service interprets this as demand that must be met, and visitor areas are expanded and “upgraded” beyond what sound national park management would allow

Sustainable partnerships should recognise the different, but particular, case of national park contribution to the community. They would be characterised by the partners acknowledging the following statement

The successful conservation of the natural heritage of NSW depends on a sound knowledge and understanding of species, populations, ecological communities, landforms and ecosystem processes, and their responses to externalities such as threatening processes, land use changes, and visitor use.

NPWS, quoted in AG p.24 (emphasis added)

7. Guiding Principle 11. “Consultation” () is a difficult task, from observation at such meetings held by the NPWS and others. Very often, participants believe that consultation means the views they put to the Service will be adopted and implemented and are angry when that does not occur. NPWS needs to review its approach to consultation to ensure that participants clearly understand the context within which it operates, specifically when suggestions are made that conflict with the ability of the Service to deliver on them.

The development of an integrated tourism strategy will heighten the awareness and expectations of what national parks have to offer – but it must not lead, for example, to greater pressures for inappropriate development and activity on parks from tourism authorities and commercial operators.

Consultation involves clear information about objectives and constraints faced by the NPWS for the participants, and clear indication of whether requests and wishes are realistic and actionable.

8. “Off-but-near-park”.

One way to ensure sustainable visitation to national parks while also providing benefits to the local region is to provide services to visitors off-but-near-parks. Action 24 addresses this and is supported.

The most obvious is accommodation, which by tying in with guides and transport (perhaps of the mini-bus type) can generate economic and social benefit, whilst taking the people pressure off the parks and the NPWS. This would not mean that on-park accommodation would disappear, but it would be at the self-sufficient end of the spectrum (eg, small tent, rather than cabin or large van) and could be shorter-term and requiring less infrastructure.

This may require locating facilities, infrastructure and services for visitors outside of or on the perimeter of parks, or restricting them to defined precincts within parks.

LP p.16

This scenario is particularly apt for the north coast and tablelands, where towns such as Tenterfield which serves as a base for visiting national parks such as Bald Rock, Boonoo Boonoo, Basket Swamp, and Girraween, (Qld). Grafton, Lismore, Coffs Harbour and other towns are as well placed in relation to a range of national parks from rainforest to coastal.

Expansion of this desirable concept would necessarily see a change in the way the economic benefits of national parks are measured. The current requirements for NPWS to raise funds would need to be reviewed, and altered. Funding of national parks and their management would need to take into account the economic and social benefit provided.

NSW’s parks are being increasingly recognised for their potential to encourage economic activity in rural and regional areas. Expenditure by people visiting parks and expenditure on park management encourages economic activity and generates employment.

LP p.14

This is consistent with part (d) of the principles of ESD,

improved valuation, pricing and incentive mechanisms—namely, that environmental factors should be included in the valuation of assets and services. *LP* p.27

At present, CVB considers that current practice falls well short of this principle, and it needs to be better incorporated into government policy and action.

As the tourism/visitation strategies develop, some farm enterprises could benefit by an expansion of the farm-stay concept and might benefit from near-by national parks. In the western region, some shearers quarters which are no longer used for their original purpose, are now used for groups (eg, Gould League Bird Study Camp Club), and this has potential for expansion.

9. Action 9

Action 9 does not relate to the discussion before it, in Outcome 1.4. CVB believes the Action should be re-written to reflect the content of the discussion, or that the Action specifically incorporate the discussion.

The reason for this is that in other documents and summaries that use LP, often only the Actions will be included and, in this instance, the full intent will not be conveyed to readers, especially decision-makers more focussed on tourism *per se*.

Considering Action 9 as it is written, the following points are made:

- a “consistent corporate image” should not mean a “one-size-fits-all” outcome. The ‘Park Facilities Manual’ should result in designs which fit in to the natural setting. They should not be over-done, over-stated or over-built. Blending into the site will mean that facilities in rainforest, will differ from facilities in rocky, eucalypt country, and so on.
- While CVB is unaware of ‘Life Cycle Cost Planning’ as it applies in *LP*, the Branch does urge that best practice for national parks allows for buildings and constructions to weather, and moulder. This would entail an acceptance that maintenance and replacement would happen more frequently. If the Building Code of Australia is inconsistent with this approach, then the Code should be adapted to cover national parks.
- National parks should be leaders in environmentally sound, low-energy construction and architecture. For example, where electrical power is needed, it should be from solar energy where possible; consistent with growing trends, CCA treated timber should not be used in national parks.
- If the visitation Strategy develops as CVB hopes, then the amount of consideration given to “site hardening” will see much less occurring. Reversibility of an action should generally remain a possibility.

Outcome 1.4

Actions such as site hardening need to be judicious and justified by their contribution to mitigating impacts.

Adopting these suggestions will contribute to the public enjoyment and appreciation of national parks. The Action would also complement Outcome 2.2 by enhancing understanding and appreciation.

10. Action 13.

Outcome 2.3 is well expressed, as is the accompanying text.

However, legal action (threatened and actual) against the NPWS has been affecting park management in visitor areas through, for example, destruction of trees (whole or partial). While some destruction might be countenanced, other methods such as closing areas to the public, and/or providing relevant information should be given greater consideration.

The recreational expectations of visitors national parks some of which are referred to on page 13, such as 'solitude or adventure with few facilities or constraints'; 'unspoilt nature of the environment within parks' can be denied if removal of risk goes too far.

Outcome 2.3

Visitors are aware of the opportunities and risks associated with recreational use of parks, and make choices appropriate to their skills and experience.

Risk management plans should consider

- closing areas as a viable alternative to destruction or overbuilding.
- having national parks, as areas for self-reliance and adventure, understood to have some degree of risk, and visitors accept this.

Action 13.

- preparation of risk management plans for parks [action 4.3.3 Tourism Masterplan],
- management of risk to wildlife from visitation.

National parks should be designated as "enter at own risk" if necessary, to ensure that management according to the objectives are not compromised or driven by litigation fears.

If Australian Standards are applied to national park facilities (such when rails on tracks or little bridges across streams should be in place), and affect the national park "feel", or are more appropriate in urban settings, then an *Australian Standard (national parks)* should developed for national park infrastructure.

Such an *AS(np)* should reflect the provision of recreation in a natural setting that incorporates adventure, self-reliance and some degree of risk.

Management of risk to wildlife should be a responsibility of all who have an opportunity to inform the tourists and visitors, across the board. Feeding wildlife is a particular problem, and should be acted on as a whole of government matter.

11. Outcome 3.4.

Reverse the order of the first two dot points to reflect the priority of conservation over visitor needs.

Implementation of the strategy should see managers always meeting the needs and wants of visitors in terms of what is consistent with protecting national park values.